

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT OF MASSACHUSETTS
MOAKLEY COURTHOUSE ONE COURTHOUSE WAY BOSTON, MA 02110 (617) 748-9152

EASTERN DIVISION

U.S. DISTRICT COURT
DISTRICT OF MASS.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

VENUE-MOAKLEY'S FEDERAL COURTHOUSE Bell v BofA
Corporate Center, et al (Injunction)

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

BOSTON Moakley's Eastern Div

Miss Shawn Bell (sole litigant)
*NOT TO BE CONSOLIDATED WITH ANY OTHER
CASE OTHER THAN BANK OF AMERICA CORP.
CENTER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

Bank of America Corporate Center (BofA), et al
ATTN: BofA Corp. LEGAL DEPARTMENT
RE: BofA 100 Federal St. Boston, MA/Risk Dept.
BofA 25 ALH Revere, MA (Bell Circle); BofA FB

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

Pro Se: Miss Shawn Bell (sole litigant)
Homeless/TBI Disabled in Boston- PO BOX 51891
Boston, Suffolk County
MA 02205
#BOSTONBofASToleMyMoneyAndAccounts2018
2017homeless.in.logan.airport1@gmail.com
#PoliceBrutalityIsNotJustAgainstMen

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	Bank of America Corporate Financial Center
Job or Title (if known)	ATTN: LEGAL DEPARTMENT
Street Address	100 Tryon Street
City and County	Charlotte; Mecklenburg County
State and Zip Code	North Carolina, 28202
Telephone Number	BofA Reps refused to give me BofA Corp. Center/Legal Dept Info.
E-mail Address (if known)	

Defendant No. 2

Name	Bank of America Branch
Job or Title (if known)	Branch Owner & alleged "Risk Department" (no managers)
Street Address	100 Federal Street
City and County	Boston; Suffolk County
State and Zip Code	Massachusetts 02114
Telephone Number	(800) 240-6886
E-mail Address (if known)	

Defendant No. 3

Name	Bank of America Branch
Job or Title (if known)	Branch Owner (no managers)
Street Address	25 American Legion Highway @ Bell Circle
City and County	Revere; Suffolk County
State and Zip Code	Massachusetts 02151
Telephone Number	(800) 240-6886
E-mail Address (if known)	

Defendant No. 4

Name	Bank of America Social Media-Facebook Messenger
Job or Title (if known)	Customer Service Reps. (Julio tried to misdirect & misinform)
Street Address	c/o Bank of America Corporate Center 100 Tryon Street
City and County	Charlotte; Mecklenburg County
State and Zip Code	North Carolina, 28202
Telephone Number	BofA Reps refused to give me BofA Corp. Center/Legal Dept Info.
E-mail Address (if known)	

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

NOT APPLICABLE

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Miss Shawn Bell, is a citizen of the State of (name) Massachusetts.

b. If the plaintiff is a corporation

The plaintiff, (name) Not Applicable, is incorporated under the laws of the State of (name) Not Applicable and has its principal place of business in the State of (name) Not Applicable.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Bank of America Corporate Center, is a citizen of the State of (name) North Carolina. Or is a citizen of (foreign nation) Not Applicable.



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* If Fraud is determined I would like
to press Charges against these white
collar thieves.

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b. If the defendant is a corporation

The defendant, (name) Bank of America Corporate Center, is incorporated under
the laws of the State of (name) North Carolina, and has its
principal place of business in the State of (name) North Carolina.
Or is incorporated under the laws of (foreign nation) Not Applicable
and has its principal place of business in (name) Not Applicable.

(If more than one defendant is named in the complaint, attach an additional page providing the
same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at
stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Fines for "white collar" Bank Fraud is \$1 million dollars. Plaintiff should receive more
than fines paid to Gov. Asking \$3.5 million dollars plus court cost, punitive damages,
interest, days gone without food. Late fees in applicable, payment of bills set up with
automatic payment if applicable. Misrepresentation. Jose said female rep nor I could
do the Automatic Pmt illegal access to my accounts before Branch stole accounts &

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the
facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant
was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights,
including the dates and places of that involvement or conduct. If more than one claim is asserted, number each
claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if
needed.

A. Where did the events giving rise to your claim(s) occur?

Greater Bostonians Area Disclosure was Magically updated Nov. 2017 when I went into The
100 Federal St Boston Location about my credit card. I Do NOT have debit card only ATM
cards. Revere, MA @ Bell Circle. Bank Harassment intensified when I made a withdrawal of my
SSA Disability Benefits then made a Credit Card payment at the same BofA ATM January 2018
at the LOGAN INTERNATIONAL AIRPORT. Stealing my accounts prevented me from appearing
in Hampden County Superior Court for a HUD FRAUD 15CV749 (Reason I'm Homeless) I waited
over 2 1/2 years after Senga Fulton in Housing Court said MHA, Inc Never had HUD Infested
house scabies bedbugs, assault/threats Restraining Order contacted State Attorney Healey

B. What date and approximate time did the events giving rise to your claim(s) occur?

Spring 2017-Made several request for credit card w/new CVV. Each time BofA Credit Card Div.
sent m a card w/same CVV May 2017 I ordered a new secure credit card deducted from
account. Received new Mastercard wouldn't work. BofA cnx card and sent check of secured
deposit. On Nov. 27, 2017 I-Walked into BofA @ 100 Federal St Boston because my payment
for my cellphone was returned to my card. After Asian BofA rep. saw my cnx MasterCard/2
Visa Cards w/same CVV she told me I to leave. I began recording her. After "Jose" Processed
my Automatic Payments 12/22/2017 I had problems w/accts. 2/02/2018 Jose said my
accounts closed w/o notice including Feb. 2018 SSA Disability Direct Deposits: Hungry/\$0.

BofA compromise my security by placing my
FULL account number on bank statement
Question: Does this "Jose" of BofA Revere, MA
Really work for BofA or just there to steal
my accounts/SS. Disability Benefit Feb. 2018
As long as I used ATM accounts were fine "Jose"
processed my Automatic payment Dec. 2017 said female
rep. couldn't do it. He gained access thru a lost my account
Feb. 2018
Jan. 2018

Never Saw Asian Female
@ BofA Federal St before
Nov. 2017 / I was there since Jan. 2017

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"Jose introduced himself
as BofA Manager. I never saw him there
before then - Jan. 2017



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- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
- MA State Police Troop F Arrested me for being homeless on East BMC-1705CR1492 Dec. 20, 2017 w/o due process & running fingerprints etc, did an illegal search of closed /taped including bank cards looking for a MA Driver's License (to sue MA DOT.) Dismissed before trial but constant harassment, discrimination including MA Revere Police Headquarters who shut off ALL the water in station when I walked into their use the restroom so I couldn't wash my hand or flush toilet. I don't think its a coincidence that my accounts are now closed by Revere, MA BofA I think its Jose doing a favor for the boys in blue for my lawsuit I'm filing February 2018 against the MA State Police Troop F/McKeon. Who continued to endanger my life and harass me last date Jan. 24, 2018 @ 0100 hours forced me, female, black and disabled outside to roam the Streets of Revere, MA in 18 degree weather until I posted the video of MA State Police harassment/discrimination on Facebook for my family to see in W. MA.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

My credit Card is attached to upcoming Federal legal litigations including SSA Hdqtrs MD w/an ongoing disability issue since 2012, MA State Police; Housing Authority discrimination 2015 (reason for homelessness) etc & in my belief if "Jose" Revere, MA /Asian female at 100 Federal St can be deposed of proof Boston Transactions since last year, Jan. 2017 I believe they would. 2nd my credit score will be ruined; prohibiting rental. Defamed my credit history reflecting instability with accounts I've maintained since 2014 in the state of MD No credit history is worse than bad credit history. My credit card limit was just increased by BofA Dec. 2017. So, BofA Corporate office did not view me as a risk. I'm dealing w/ BofA Rep. personal vendetta & discrimination to cover up their branch fraud concerning my account. Case and point, after making a credit card payment at 100 Federal St Boston, MA, I forgot my card at the ATM. I called to have the CVV changed, received cards with the same CVV as original jeopardizing security. Asian BofA rep told me to leave after seeing 2 cards w/same CVV.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Re-open ALL my accounts ASAP, increase Credit Card Limit w/new CVV. Pay ALL late fees for entities set up for automatic payment. Restrain Those in plcs/videos & other BofA reps from tampering & obstructing justice; BofA Corporate Center to do investigation of fraud by BofA 100 Federal St Boston MA/25 American Legion Hwy (Bell Circle) Revere, MA. ** MA Dept. of Transitional Assistance reduced my Foodstamps amount, to \$96/mo stating, "you no longer pay for unit". I never reported changes to MA DTA & what unit are they referring to? Storage? Or the one MA DTA 1010 Massachusetts Ave, Boston, MA made up? Claim I pay \$0 for rent but pay utilities when I submitted "Verification of Homelessness" in 2017 & took pic of letter to DTA caseworker (MassHealth stop paying my Part B Medicare because of this since June 2017-to date 2018) Branches pay punitive damages for destroyed, disposed of violated the privacy of my account. TRO to prevent Storage Units from taking possession of my unit if Boston's BofA blocked their authorized pyt 4h Amendment

IRREPARABLE INJURY Con't. Missed Civil Suit Hearing in Hampden County Superior Court on February 09, 2018 because Boston BofA stole my accounts and Feb. 2018 SSA Disability Benefit No money to leave Boston. No food, Rely on kindness of strangers for food. In process of suing MA DTA EBT & MassHealth for Fraud/unnecessary hardship



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VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/23/2018

Signature of Plaintiff

Printed Name of Plaintiff

Pro Se-Miss Shawn Bell

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Not Applicable